City of Santa Barbara
California

PLANNING COMMISSION
STAFF REPORT

REPORT DATE: June 10, 2008

AGENDA DATE: June 19, 2008

TO: Planning Commission

FROM: Planning Staff

SUBJECT: DRAFT COMMENT LETTER - UCSB 2008 LONG RANGE DEVELOPMENT PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT

In March 2008, the University of California, Santa Barbara (UCSB) released a Draft 2008 Long Range Development Plan (LRDP) and associated Draft Environmental Impact Report (DEIR). Both documents can be viewed in their entirety at www.ucsbvision2025.com. Summaries of the 2008 LRDP and DEIR are included as Exhibits A and B respectively. The public and local jurisdictions have until June 23, 2008 to comment on these documents. Exhibit C is a draft comment letter to UCSB on the 2008 LRDP and DEIR. This letter discusses several areas of concern for the City, including enrollment, housing, traffic, open space and biological resources, water supply, noise, and land use compatibility with the Santa Barbara Airport.

Background

In 1980, a Long Range Development Plan was prepared for UCSB and certified by the California Coastal Commission. The 1980 plan provided for development on campus to increase enrollment at the University to 14,500 students with related staff and faculty. Subsequently, UCSB prepared a new LRDP in 1990 that was certified by the Commission that guided the physical development of the campus through the academic year 2005/2006. The 1990 LRDP projected that the on-campus student population would increase to 20,000 and that the faculty and staff population would increase to 4,473 by 2005-2006. Through the years, the City has collaborated with UCSB on the development and implementation of the 1990 LRDP through participation in the LRDP Implementation Advisory Committee. In 1991, the City of Santa Barbara, County of Santa Barbara, Citizens for Goleta Valley, Citizens Planning Association, and the Isla Vista Association signed two cooperative relations agreements with the University that addressed phasing of student housing, affordable faculty and staff housing, limits on enrollment, traffic improvements, and implementation of a mitigation monitoring program for the 1990 LRDP.

The submitted Draft 2008 LRDP would update the 1990 LRDP and serve as a "general plan" to guide land use and physical improvements to accommodate growth at the University through the year 2025. It is the intention of the University to forward this new document to the California

Coastal Commission for review and approval to satisfy the requirements of the California Coastal Act of 1976. As outlined in Exhibit A, the 2008 LRDP provides for an increase in enrollment of 5,000 students, totaling 25,000 students, by 2025. During that same time frame, 1,736 additional faculty and staff would be hired for a total of 6,431 faculty and staff on campus. The 2008 LRDP also includes construction of an additional 2.5 million gross square feet of academic, research, and support facilities on campus. The University is also proposing the addition of 5,443 bed spaces and 239 student family units on campus to house enrolled students. An additional 1,874 additional faculty and staff on-campus housing units are also proposed. Finally, the 2008 LRDP would modify various land use and resource policies previously included in the 1990 LRDP and subsequent amendments.

RECOMMENDATION

Staff recommends that the Planning Commission provide input on the draft comment letter to UCSB regarding the Draft 2008 LRDP and associated Draft EIR.

Exhibits:

A. Table Summarizing the UCSB 2008 Long Range Development Plan
B. UCSB Long Range Development Plan Draft EIR Executive Summary
C. Draft Comment Letter to UCSB from City of Santa Barbara (June 10, 2008)

2008 UCSB LRDP SUMMARY			
	Current	**Proposed 2008-2025 LRDP**	**Total**
Student Enrollment	20,000 students	5,000 additional students at a rate of 1% per year	25,000 students
Faculty and Staff Populations	1,054 faculty 3,631 staff	336 additional faculty 1,400 additional staff	1,400 faculty 5,031 staff
Instruction, Research, and Support Space (ASF)	~2.7 M ASF	~1.8 M ASF additional	4.5 M ASF
Instruction, Research, and Support Space (GSF)	~3.8 M GSF	~2.5 M GSF	6.3 M GSF
Student, Faculty, and Staff Housing Units	5,679 bedspaces 973 bedspaces (pending)	5,443 additional bedspaces	12,095 single student bedspaces
	553 student family units 151 student family units (pending)	239 additional student family units	943 student family units
	65 faculty units 161 faculty units (pending)	1,874 additional faculty and staff housing units	2,100 faculty and staff units
Athletic/Recreational Fields	~26 acres of fields	5 additional acres of fields	31 acres of fields
Parking Spaces	6,600 spaces constructed or planned (non-housing) 3,880 constructed or planning (housing) Total Inventory: 10,480 spaces	Replace 5,100 spaces Construct 3,650 additional spaces	~14,130 spaces

Source: Draft Environmental Impact Report, UCSB 2008 LRDP, March 2008

2008
Long Rage Development Plan
Draft Environmental Impact Report

Section 2: Summary

University of California, Santa Barbara
Office of Campus Planning & Design
Santa Barbara, CA 93106-1030

March 2008

EXHIBIT B

CHAPTER 2.0

Summary of Environmental Impacts and Mitigation Measures

2.1 Introduction

UC Santa Barbara's 2008 Long Range Development Plan (LDRP) directs the growth of the campus from adoption through 2025. This Environmental Impact Report (EIR) analyzes potential impacts associated with that growth. Section 15123 of the California Environmental Quality Act (CEQA) requires an EIR to provide a summary of impacts, mitigation measures, project alternatives, areas of known controversy, and issues to be resolved. In addition to the required elements of the EIR's summary, concise discussions of the LRDP's project description and objectives are included to provide context for the summary discussions.

2.2 Project Description

The UC Santa Barbara 2008 LRDP sets forth a program for the development, redevelopment and preservation of land owned or managed by the University to 2025. The 2008 LRDP will replace the current 1990 LRDP. The LRDP will provide guidance for locating future land uses and buildings while maintaining adequate flexibility for future decision making.

Within the planning time frame from 2008 to 2025, UC Santa Barbara will expect enrollment numbers of 25,000 students for the Fall-Winter-Spring quarters, as well as a total of approximately 6,400 faculty and staff. Physical development associated with the 2008 LRDP will include:

- Approximately 2.5 million additional gross square feet of new academic and research facilities;
- Increased student housing (5,443 bedspaces; 239 student family units), and faculty and staff housing 1,874 units) on campus;
- New bicycle, transit, and pedestrian circulation routes;
- Recreation and athletic facilities (an additional 5 acres of recreational fields);
- Parking (5,100 replaced spaces, and an additional 3,650 spaces);
- New and renewed infrastructure.

The 2008 LRPD also includes growth related to the acquisition of land by the University, much of which will not be developed, but will be presented as an overstatement open space. The 2008 LRDP identifies areas of natural reserves, undeveloped areas, paved plazas, and landscaped areas.

2.3 Project Objectives

The 2008 LRDP includes objectives that provide direction to the University for its physical development. These objectives were formulated as part of the UC Santa Barbara's Strategic Academic Plan. The Academic Plan is intended to "establish the academic foundation for UC Santa Barbara."[1] In summary, the 2008 LRDP objectives are:

1. Mature the Academic Programs.
2. Strengthen the Campus Form.
3. House Students, Faculty and Staff.
4. Integrate Sustainable Practices.
5. Contribute to Regional Solutions.

A complete discussion of the project objectives is included in Section 3.0, Project Description.

2.4 Impact Summary

The Initial Study (Appendix 1.0) identified potential significant impacts associated with fifteen topic areas. Table 2.0-1 on page 2-4 states each of the impacts analyzed in this EIR, the significance of the impact, mitigation measures (if any) to lessen or avoid the effects of the impact, and the residual significance following mitigation.

2.5 Alternatives to the Proposed Project

Alternatives were developed and were compared to the 2008 LRDP. Each alternative is considered for its ability to attain the basic project objectives listed above, and the significance of the alternative's impacts compared to those of the proposed project. The alternatives to the proposed 2008 LRDP analyzed in this EIR are:

- **No Project**: The 1990 LRDP, which is nearly built to completion, would remain as UC Santa Barbara's long range development plan.
- **Reduced Enrollment**: Instead of the proposed 5,000 increase in the enrolled student population over the plan's buildout to 2025, the University would accommodate a 3,000 student increase.
- **No On-Campus Housing**: No new campus housing would be proposed under this alternative.
- **Virtual University:** This alternative involves increased use of on-line and/or dispersed resources by students, increasing the need for staff, but reducing the need for physical facilities such as academic buildings and student housing.

[1] Source: UC Santa Barbara. "Draft 2008 LRDP," p. A.1.

Section 5.0 (Alternatives) concludes that the environmentally superior alternative is the Reduced Enrollment Alternative, because it incrementally reduces development and, therefore, reduces impacts to traffic, water and air quality. Table 5.0-1 in the Alternatives section provides a brief comparison of each alternative to the impacts identified for the proposed LRDP.

2.6 Known Areas of Controversy

The Notice of Preparation elicited a number of comments which indicated issues associated with the University's expansion. These coincide largely with issues that have been raised in the past. They can be summarized as:

- University growth will induce additional growth in the region.
- Water supply is limited.
- Traffic congestion in the area of the University.
- Housing is expensive and in short supply.
- Impacts to sensitive biological resources
- Impacts to Ocean Road and Isla Vista

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
4.1 Aesthetics				
	Development under the 2008 LRDP would improve scenic vistas from critical view corridors and viewpoints within the Main Campus to scenic resources such as the Pacific Ocean and the Santa Ynez Mountains. This will be a beneficial effect.			
	Development under the 2008 LRDP would improve the visual character of the Main Campus when viewed from critical view corridors and viewpoints within the Main Campus. This will be a beneficial effect.			
	AES-1 Development under the 2008 LRDP would change scenic vistas from critical view corridors and viewpoints within the Main Campus to scenic resources such as the Pacific Ocean and the Santa Ynez Mountains.	Less than significant	None required	Less than significant
	AES-2 Development under the 2008 LRDP would change the visual character of the Main Campus when viewed from critical view corridors and viewpoints within the Main Campus.	Less than significant	None required	Less than significant
	AES-3. Development of the Ocean Road corridor within the Main Campus under the 2008 LRDP could substantially affect scenic vistas from critical view corridors and viewpoints surrounding the Campus.	Significant	**AES-3A** Prior to approval of development projects along Ocean Road under the 2008 LRDP, the University of California shall review project designs for: • Protection of views to coastal and mountain resources from viewpoints on Ocean Road, roadways within Isla Vista, and along El Colegio Road. • Campus development and design along Ocean Road respecting the adjacent Isla Vista neighborhood in terms of scale, proportion, appearance, and solar access, as well as maximizing views to the Pacific Ocean. • Landscaping associated with project development and design along Ocean Road not blocking views of the ocean or hills.	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	Development under the 2008 LRDP would improve the visual character of the developed portions of the Storke Campus when viewed from critical view corridors and viewpoints within and surrounding the Storke Campus. This will be a beneficial effect.			
	AES-4 Development of the housing complexes within the Storke Campus under the 2008 LRDP could substantially affect views of the Santa Ynez Mountains from critical view corridors and viewpoints within and surrounding the Storke Campus.	Significant	**AES-4A** Prior to approval of development projects on Storke Campus under the 2008 LRDP, the UC Santa Barbara Design Review Committee shall review project designs for protection of views to the Santa Ynez Mountains from viewpoints along Storke Road, El Colegio Road, Los Carneros, and roadways within Isla Vista that intersect El Colegio Road, and within and through the Storke Campus. **AES-4B** Project development and design on the Storke Campus shall consider the effect of existing and proposed landscaping on views.	Less than significant
	AES-5 Development within the West Campus under the 2008 LRDP could substantially affect views of the Santa Ynez Mountains, Devereux Slough, and Pacific Ocean from critical view corridors and viewpoints within and surrounding the West Campus.	Significant	**AES-5A** Prior to approval of development projects on the West Campus under the 2008 LRDP, the UC Santa Barbara Design Review Committee shall require an analysis of the development's effect on views to the Santa Ynez Mountains, Devereux Slough and Pacific Ocean from viewpoints along Storke Road, El Colegio Road, Devereux Road and other public roadways and within and through the West Campus. Adverse affects identified in the analysis shall be avoided, minimized or mitigated as part of development.	Less than significant
	AES-6 Development under the 2008 LRDP would substantially alter the visual character of the natural areas of the West Campus when viewed from critical view corridors and viewpoints within and surrounding the West Campus.	Significant	**AES-6A** Prior to approval of development projects on the West Campus under the 2008 LRDP, the UC Santa Barbara Design Review Committee shall require review of the effects to the existing high quality visual character of the natural features of the West Campus from viewpoints along Storke Road, El Colegio Road, Devereux Road and other public roadways. Adverse effects shall be avoided, minimized, or mitigated by the development. **AES-6B** Development on the west campus shall be designed and construction activities shall be undertaken in a manner that shall preserve healthy and mature trees adjacent to natural areas to the greatest extent possible.	Less than significant
	AES-7 Development under the 2008 LRDP could create new sources of substantial light or glare	Significant	**AES-7A** Lighting for new development projects shall be designed to include directional lighting and shielding to minimize light spillage and atmospheric light pollution.	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	on campus that could adversely affect daytime or nighttime views in the area.		This lighting should be compatible with the visual character of the surroundings. **AES-7B** The UC Santa Barbara Design Review Committee shall require the incorporation of measures into the project design to limit light and glare to the extent feasible. **AES-7C** The UC Santa Barbara Design Review Committee shall review outdoor lighting plans and fixtures for parking facilities, roads, and pathways to ensure that the minimum amount of lighting needed to achieve safe routes is used, and to ensure that the proposed illumination limits adverse effects on nighttime views.	
	Development under the 2008 LRDP would not impact scenic resources, such as trees, rock outcroppings, and historic buildings, within a state scenic highway. The effect is less than significant.			
Cumulative Impacts	**AES-8** Development allowed under the 2008 LRDP, in conjunction with other development in the region could affect local scenic vistas of the Santa Ynez Mountains, Pacific Ocean, coastline, Devereux Slough, and other coastal resources.	Significant	**AES-8A** Implement LRDP Mitigation Measures AES-3, 4, 5, 6, and 7.	Less than significant
	AES-9 Development allowed under the 2008 LRDP, in conjunction with other development in the region could result in increased light and glare that could adversely affect nighttime views in the region.	Significant	**AES-9A** Implement LRDP Mitigation Measures AES-7A, 7B, and 7C.	Less than significant
	Development allowed under the 2008 LRDP, in conjunction with other development in the region, would result in cumulative visual changes, which would not substantially degrade the existing visual character. The effect is less than significant.			
4.2 Air Quality				
	AIR-1 Campus growth under the 2008 LRDP would result in daily operational emissions above the SBCAPCD thresholds; therefore the proposed project may contribute to a violation of air quality standards or hinder attainment of the	Significant	**AIR-1A** Vehicular Sources. UC Santa Barbara shall implement LRDP Mitigation TRAFFIC-1, TRAFFIC-2, TRAFFIC-4, TRAFFIC-5, TRAFFIC-6 to reduce motor vehicle trips by enhancing bicycle, pedestrian, and transit facilities and services. **AIR-1B** Area Sources. The LRDP shall support the full implementation of UC Santa	Unavoidable

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	2007 Clean Air Plan.		Barbara's Sustainability Plan and the green building policy for higher energy efficiency to ensure design and construction features that reduce natural gas dependence are incorporated into all new buildings.	
	AIR-2 Campus operations emitting TACs may be increased under buildout of the 2008 LRDP, which has the potential to create an unacceptable health risk. Increased growth has the potential to generate an increase in sensitive receptors exposed to TACs.	Less than significant	None required	Less than significant
	AIR-3 Construction activities under the 2008 LRDP would result in emissions of NO_x and PM_{10} on a short-term basis.	Significant	**AIR-3A**: Prior to the commencement of construction activities on each project component, UC Santa Barbara will require the principal construction contractor to develop a construction mitigation plan including all applicable SBCAPCD construction emission reduction measures for fugitive dust and equipment. The elements of such a plan, to be approved by UC Santa Barbara, and implemented by the managing contractor, will include the following: *Equipment* 1. Contractors shall utilize only heavy-duty diesel-powered construction equipment manufactured after 1996 (with federally mandated "clean" diesel engines". All equipment shall be properly tuned and maintained as evidenced by maintenance logs. *Fugitive Dust* 2. Water all active construction areas at least twice daily, or as needed. Increased watering frequency when wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. 3. Minimize amount of disturbed area and reduce on-site vehicle speeds to 15 miles per hour or less. 4. Gravel pads must be installed at all access points to prevent tracking of mud onto public roads.	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			5. If exportation and stockpiling of fill material are involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin. 6. After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will be minimized. 7. The principal construction contractor shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to UC Santa Barbara or its designee prior to the commencement of construction activity.	
	AIR-4 Construction activities associated with the implementation of the 2008 LRDP have the potential to increase health risk from short-term exposure to TACs.	Significant	**AIR-4A** Implement Mitigation Air-3A. **AIR-4B** Locate construction staging area away from sensitive receptors and equipment such as fresh air intakes to buildings, air conditioners, and windows. **AIR-4C** If the project is determined to exceed the limits in Table 4.2-13 (resulting in emissions more than 2,365 pounds per year DPM) then prior to the commencement of construction activities on each project component, UC Santa Barbara will require the principal construction contractor to include emission reduction measures for construction equipment in the construction mitigation plan (see Mitigation AIR-3A above). Measures that would reduce construction-related emissions, which are to be implemented by the managing contractor as deemed applicable, include, but are not limited to: 1. The use of Caterpillar pre-chamber, diesel-fired engines (or equivalent low NO_x engine design) in heavy equipment	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			shall be used for construction activity to further reduce NO_x emissions. 2. All fossil-fueled equipment shall be properly maintained and tuned according to manufacturer's specifications. 3. The University shall require that all off-road and portable diesel-powered equipment including but not limited to bulldozers, graders, cranes, loaders, scrapers, backhoes, generator sets, compressors, auxiliary power units, shall be fueled exclusively with ARB certified diesel fuel. 4. Install diesel oxidation catalysts (DOC), catalyzed diesel particulate filters (CDPF) or other District approved emission reduction retrofit devices. 5. The University shall require that three catalyst-based diesel particulate filters (DPFs) with low sulfur diesel fuel during the Site Work phase. One particulate filter shall be installed from the first phase of construction activity onwards, on the piece of equipment present on site for the longest duration. The DPFs will be installed on the largest emitters (assumed to be equipment such as bulldozers, scrapers, backhoes). Completion of monitoring forms will be required prior to start of work. 6. Diesel powered equipment should be replaced by electric or alternative fueled construction equipment where such fuel or equipment is reasonably obtainable and competitively priced. 7. Idling of heavy-duty diesel trucks during loading and unloading must be limited to five minutes; auxiliary power units should be used whenever possible. Signage shall be posted to remind drivers not to idle. 8. Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite. 9. Construction truck trips should be scheduled during non-peak hours to reduce peak hour emissions.	
Cumulative	**AIR-5** Implementation of	Significant	**AIR-5A** Implement LRDP Miigation AIR-1	Unavoidable

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
Impacts	the 2008 LRDP, in conjunction with other development in Santa Barbara County, would result in a cumulatively considerable increase of non-attainment pollutants (ozone and PM_{10}).		(A-B).	
	AIR-6 Regional growth would not result in an increase in toxic air contaminants because of the implementation of technological improvements.	Less than significant	None required	Less than significant
4.3 Biology				
	BIO-1 Development under the 2008 LRDP could directly and indirectly impact aquatic and wetland resources within and adjacent to the campus.	Significant	**BIO-1A** Prior to start of construction of any portion of the 2008 LRDP with potential to impact aquatic resources, all necessary permit authorizations shall be obtained. These may include, but may not be limited to: (1) Army Corps of Engineers Section 404 Nationwide Permit or Individual Permit for impacts to Army Corps of Engineers jurisdictional wetlands or other waters; (2) Regional Water Quality Control Board Section 401 Water Quality Certification for discharges to "Waters of the U.S." and/or "Waters of the State;" (3) California Department of Fish and Game Section 1602 Streambed Alteration Agreements, and, (4) California Coastal Commission Coastal Development Permit. All requirements of any permits issued shall be complied with prior to and during all work activities. **BIO-1B** Prior to start of construction of any portion of the 2008 LRDP with potential to impact aquatic resources, UC Santa Barbara shall implement LRDP Mitigation Measures HYD-1A and 1B as appropriate, resulting in preparation of detailed sediment and erosion control plans for each specific project. Plans shall specifically address protection of drop inlets (DI's), and other drainage structures, locations of soil and material stockpiles and staging areas, spill prevention and cleanup, and shall establish specific areas for cleaning and refueling equipment. Plans shall include regular monitoring to ensure proper installation and maintenance of protective measures. **BIO-1C** Prior to start of construction of any	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			portion of the 2008 LRDP with potential to impact aquatic resources, UC Santa Barbara shall retain an agency-approved biological monitor to ensure compliance with the project environmental document and all applicable permit conditions. Monitoring shall occur at a frequency and duration determined by the university in consultation with the permitting agencies (e.g., ACOE, USFWS, CCC, and CDFG). **BIO-1D** Project plans for any development under the 2008 LRDP within 100 feet of aquatic resources shall include design features to minimize the effects of increased noise, lighting, and automotive and foot traffic density on the adjacent aquatic resource.	
	BIO-2: Development under the 2008 LRDP could impact Southern tarplant, a CNPS List 1B species identified as present within areas of the campus proposed for development.	Significant	**BIO-2A** Development under the 2008 LRDP shall avoid all special-status plant species, including known locations of Southern tarplant to the greatest extent possible. **BIO-2B** If LRDP development is unable to avoid known locations of Southern tarplant, or if development is proposed in an area that provides potentially suitable habitat for tarplant or other sensitive plants, focused botanical surveys shall be performed on the site during the peak blooming season prior to start of construction. The size and location of all identified occurrences shall be mapped on the final project plans, and impact acreages shall be quantified based on proposed limits of disturbance. This impact acreage shall be used to determine the size of mitigation sites to be established for the project. Mitigation area shall be at least at a 1:1 ratio to the disturbed area, or at a higher ratio determined by the responsible agency (CDFG/CCC). **BIO-2C**If LRDP development is proposed within known locations of Southern tarplant, project-specific Tarplant Restoration Plans shall be prepared by a qualified biologist that address tarplant impacts and appropriate mitigation and conservation measures. Conservation measures may include maintaining existing stormwater inputs to undisturbed populated areas, retention of soil seed banks, seed collection, transplanting of individual plants, plant propagation, and revegetation and preservation of designated mitigation sites in the vicinity of the project site or sites.	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			BIO-2D Implementation of Tarplant Restoration Plans will be conducted under the direction of a qualified biologist. Restoration shall include initial site preparation, planting, and ongoing maintenance and monitoring efforts. Restoration efforts shall continue for at least five years, and shall be considered successful when a self-sustaining population as evidenced by survival and natural reproduction of southern tarplant is present within the mitigation site. If the mitigation site is a preserve for an existing population, the initial tarplant numbers documented by a focused survey during the peak blooming period will provide the baseline population data. This baseline population number must remain steady or increase over the mitigation period to show establishment of self-sustaining populations on the site. Newly created habitat areas will use the first year tarplant population data as the baseline conditions. This baseline population number must also remain steady or increase over the mitigation period to show establishment of self-sustaining populations on the site.	
	BIO-3 Development under the 2008 LRDP could cause the loss or abandonment of active bird nests, including raptor nests.	Significant	**BIO-3A** To avoid disturbance or loss of active bird nests during development under the 2008 LRDP, any removal of eucalyptus, coast live oak, pine, cypress, or other trees that provide nesting habitat for birds, or disturbance of natural grassland areas shall be conducted between September 15 and February 15, outside of the typical nesting season. **BIO-3B** If tree removals or disturbance of natural grassland areas are determined to be necessary during the typical nesting season (February 15 to September 15), nesting bird surveys shall be conducted by a qualified biologist immediately prior to the proposed action. Surveys shall follow standard protocols as established by CDFG and/or CCC. If the biologist determines that a tree or natural grassland area is being used for nesting at that time, disturbance shall be avoided until after the young have fledged from the nest and achieved independence. If no nesting is found to occur, necessary tree removal or grassland disturbance could then proceed. **BIO-3C** To avoid indirect disturbance of active bird nests by project construction occurring within the typical nesting season, a	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			qualified biologist shall be retained to conduct one or more pre-construction surveys per standard protocols approximately 1 week prior to construction, to determine presence/absence of active nests adjacent to the project site. If no breeding or nesting activities are detected within 200 feet of the proposed work area, noise-producing construction activities may proceed. If breeding/nesting activity is confirmed, work activities within 200 feet of the active nest shall be delayed until the young birds have fledged and left the nest.	
Cumulative Impacts	**BIO-4** Campus development under the 2008 LRDP, in conjunction with other development in the region, would not result in a substantial adverse cumulative impact on biological resources.	Less than significant	None required	Less than significant
4.4 Cultural Resources				
	CULT-1 Implementation of the 2007 LRDP could damage or destroy an archaeological resource as the result of ground disturbing project development activities in open environments, including grading and construction excavation	Significant	**CULT-1A** The University shall define the project APE and direct impact areas as early as possible in the planning process. The University shall review the Treatment Plan and sensitivity maps and determine whether a recent intensive survey has been conducted within the APE and whether any previously recorded cultural resources have been identified. **CULT-1B** No prior survey - the University will contact a qualified archaeologist to complete an intensive surface survey prior to any earth-moving activities. If the project area is in a Moderate/High sensitivity zone for buried resources (as identified in Figure 4.4-3), a professional archaeologist shall assess the need for "subsurface survey" through backhoe excavation or coring. **CULT-1C** No cultural surface or subsurface deposits present or identified during survey - prepare a short Negative Archaeological Survey Report; no further management.	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			CULT-1D Archaeological sites identified – prepare survey report, including background research, project context, descriptions of fieldwork, appropriate maps and photos, site records (Department of Parks and Recreation Form 523), and management recommendations (avoidance, or test excavations to determine presence/absence and eligibility). All new data will be integrated into the University GIS database using their protocols, and reports will be submitted by the professional archaeologist to the Central Coast Information Center.2 **CULT-1E** Avoidance is not possible - a qualified archaeologist will conduct minimal, initial test excavations to determine presence/absence of intact deposit within the impact area, following guidelines in Treatment Plan. A Native American monitor must be present. **CULT-1F** Impact area has no significant resources present - remaining site areas shall be fenced for protection, with no additional management. **CULT-1G** Potentially eligible resources are identified within the impact area - expand test excavations to determine California Register eligibility and CEQA significance, following guidelines in Treatment Plan. A Native American monitor must be present. **CULT-1H** Document findings in a test excavation report, detailing site integrity and evaluation criteria. **CULT-1I** Resource is ineligible - no further management is required. **CULT-1J** Resource is eligible and cannot be completely avoided by project redesign - implement data recovery measures, following the Treatment Plan. A Native American monitor must be present. **CULT-1K** Project can proceed unless data recovery efforts do not capture "unique" characteristics of the resource – implement project redesign, placement of fill, project relocation or abandonment. **CULT-1L** Present short training session for construction crews in the identification of	

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			archaeological remains and awareness of Native American concerns. **CULT-1M** If archaeological materials are discovered during project construction, work should halt immediately halt within 100 feet of the find, and a qualified archaeologist should be contacted to verify the nature of the find (go to CULT 1E-1H)	
	CULT-2 Implementation of the 2007 LRDP could damage or destroy buried archaeological resources that survive intact beneath existing structures, roadways, paring lots, landscaped areas, etc.	Significant	**CULT-2A** Determine whether project APE has been adequately surveyed for cultural resources, and/or is sensitive for prehistoric or historic-period surface or buried cultural resources. **CULT-2B** Conduct archival research to determine a history of land use within the proposed APE, including impacts from current development. Carry out historical/architectural evaluation of existing building. **CULT-2C** For sensitive locations or areas of unknown sensitivity, conduct backhoe trenching and/or surface survey once building has been removed. **CULT-2D** If unavoidable cultural resources are identified, implement compressed approach as described in Treatment Plan (combined test-evaluation/data recovery). **CULT-2E** Conduct initial testing to determine site significance, based on physical integrity and California Register criteria. A Native American monitor must be present. **CULT-2F** If the site is determined eligible and cannot be avoided, immediately initiate data recovery mitigation, as detailed in the Treatment Plan. A Native American monitor must be present. **CULT-2G** If no significant cultural resources are noted during excavations or archival research, no further management will be required. **CULT-2H** Present short training session for construction crews in the identification of archaeological remains and awareness of Native American concerns. **CULT-2I** If archaeological materials are discovered during project construction, work should halt immediately halt within 100 feet	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			of the find, and a qualified archaeologist should be contacted to verify the nature of the find (go to CULT 2E-2G).	
	CULT-3 Implementation of the 2008 LRDP could disturb human remains, including those in archaeological sites or isolated contexts.	Significant	**CULT-3A** Refer to the Native American Memorandum of Agreement. Provide a member of the local Native American community the opportunity to observe excavation activities being undertaken by a qualified archaeologist within the boundaries of known Native American archaeological sites or at other highly sensitive areas. **CULT-3B** Halt work immediately when suspected human bone is discovered, regardless of context, until a qualified archaeologist can examine the find. **CULT-3C** If the bone is determined to be human, a representative of the University will contact the Santa Barbara County Coroner (per the Public Resources Code 5097 and the California Health and Safety Code 7050.5). If the coroner confirms that the remains are Native American, the University representative will notify the Native American Heritage Commission, and the Commission will designate an individual to serve as the Most Likely Descendent (MLD), in accordance with the provisions of Public Resources Code 5097.98. Proper treatment and handling of human remains should be established in consultation with the MLD. **CULT-3D** Allow qualified archaeologist to expose the human remains to determine their full extent within the project ADI. If the project can be re-designed to avoid the remains, they should be left in place. Where avoidance is not feasible, the human remains should be excavated and removed by the archaeologist, in the presence of the MLD. **CULT-3E** Conduct appropriate analyses on the remains (e.g., age, sex, pathologies, DNA studies, radiocarbon dating) only in consultation with the MLD. **CULT-3F** Work with MLD to carry out repatriation of the exhumed human remains and all associated items, in accordance with the California Native American Graves Protection and Repatriation Act (California	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			Health and Safety Code 8010-8011).	
4.5 Geology Soils and Geotechnical				
	GEO-1 Development under the 2008 LRDP could occur on a geologic unit or soil that would become unstable and result in liquefaction or landslides creating potential risks to life or property.	Less than significant	None required	Less than significant
	GEO-2 Development under the 2008 LRDP could expose people and structures to potentially adverse effects associated with seismic ground shaking or seismic-related ground failure.	Less than significant	None required	Less than significant
	GEO-3 Implementation of the 2008 LRDP could result in construction activities in areas of expansive soils.	Less than significant	None required	Less than significant
Cumulative Impacts	**GEO-4** Cumulative development, including the development on campus under the 2008 LRDP, could expose people or structures to potential adverse effects involving seismic ground shaking.	Less than significant	None required	Less than significant
	GEO-5 Cumulative development, including the development on campus under the 2008 LRDP, would not expose persons or property to other geologic hazards, or contribute substantially to the creation of other geologic hazards.	Less than significant	None required	Less than significant
4.6 Hazards and Hazardous Materials				

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	HAZ-1 Implementation of the 2008 LRDP would increase routine use, generation, and transport of hazardous chemicals, radioactive materials, and/or biohazard materials on campus by UC Santa Barbara laboratories, departments, and in maintenance and support operations.	Less than significant	None required	Less than significant
	HAZ-2 Implementation of the 2008 LRDP would create a significant hazard to the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Significant	**HAZ-2A** The University will survey for contaminants and/or perform Phase I Environmental Site Assessments before demolishing buildings. Contractors shall be required to document on-site availability of applicable MSDS sheets and attendance of workers at safety and hazards training sessions. In addition, the University will continue to perform and/or administer the same regulating plans and programs it has in the past regarding all its potentially hazardous activities.	Less than significant
	HAZ-3 Components of the 2008 LRDP have the potential to involve emitting or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Less than significant	None required	Less than significant
	HAZ-4 A site on campus is listed by the state as a hazardous waste site. The LRDP would not alter or otherwise exacerbate conditions at the site.	Less than significant	None required	Less than significant
	HAZ-5 Parts of the study area are within the boundary of the Santa Barbara County Airport Land Use Plan. Implementation of the 2008 LRDP would not result in a safety hazard for people residing or working within these parts	Less than significant	None required	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	of the project area.			
	HAZ-6 Development under the proposed 2008 LRDP could interfere physically with the campus's Emergency Operations Plan (EOP) on a temporary basis.	Significant	**HAZ-6A** The campus shall incorporate the following mitigation measures into all construction contracts: • Construction shall be performed with the least possible obstruction and interference to traffic; • Written notification shall be given to campus users via e-mail by campus administration at least two weeks prior to any road closure; • Along with any road closures, including pedestrian and/or bike path closures, detour signs shall be posted, clearly displaying alternate routes; • Fire hydrants shall be kept accessible at all times. **HAZ-6B** Before construction commences on any building or facility that could adversely affect an existing departmental Emergency Operations Plan (EOP), the affected departmental EOP shall be evaluated and modified if necessary, according to Office of Environmental Health & Safety standards and guidelines, to accommodate both the construction-phase alterations as well as the final facilities. Evacuation plans should be reviewed after the footprint of the building and lay down areas have been established, which occur well in advance of the beginning of construction.	Less than significant
	HAZ-7 Campus Development under the proposed 2008 LRDP would not result in increased risk from wildland fires.	Less than significant	None required	Less than significant
	HAZ-8 Development proposed under the 2008 LRDP could expose construction workers or landscape workers to undiscovered petroleum hydrocarbon-affected soil/groundwater and unexploded ordnance from historical uses within the project area.	Significant	**HAZ-8A** Environmental site assessments Phase I or Phase II shall be completed at the East Side Residential Halls and the San Miguel/San Nicholas Residential Halls project sites to determine whether petroleum hydrocarbons or hazardous substances are likely to be encountered during construction. A Phase I environmental site assessment shall be completed at the Ocean Road housing project site to assess the potential for UXO and ordnance/explosives waste	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			(OEW) at the proposed housing site. If determined necessary by the Phase I surveys, Phase II site assessments (including the collection of soil and possibly groundwater samples) will be conducted to further assess the potential for contamination. Site assessment work plans shall be prepared by a registered professional and submitted to the Santa Barbara County Fire Prevention Division (SBCFPD) and the California Department of Toxic Substances Control (DTSC) for review and approval prior to implementation. If the Ocean Road housing project site is determined to be a potential UXO or explosives storage site, a UXO clearance survey shall be conducted by a qualified UXO technician to identify possible UXO locations at the project site prior to commencement of any grading, demolition or construction activities. If necessary, a corrective action plan shall be submitted by UCSB to SBCFPD and DTSC for the proper management of UXO/OEW or petroleum-related contaminated soil and groundwater that may be disturbed as part of the proposed project grading activities. Corrective actions shall be completed at the project site to the satisfaction of SBCFPD and DTSC prior to commencement of grading, demolition and construction activities. **HAZ-8B** If petroleum hydrocarbon-contaminated soil (except where hydrocarbons occur naturally) is encountered during construction activities, SBCFPD and the Santa Barbara County Air Pollution Control District (SBAPCD) shall be notified as soon as possible. Depending on the size of the excavation, the SBAPCD may require a permit prior to the excavation of contaminated soils. In addition, the following measures shall be implemented immediately after contaminated soil is discovered in accordance with SBAPCD regulations: • All soil stockpiles shall be covered with 20 mil HDPE plastic sheeting except when soil is being placed in or removed from the stockpile; • Contaminated soil shall be covered with at least six inches of packed, uncontaminated soil or other TPH-non-permeable barrier such as plastic tarp.	

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			No headspace shall be allowed where vapors could accumulate; • Covered piles shall be designed in such a way to eliminate erosion due to wind or water. No openings in the covers are permitted; • During soil excavation, odors shall not be evident to such a degree as to cause a public nuisance; and, • Clean soil must be segregated from contaminated soil. **HAZ-8C** Implement Mitigation AIR-3A during all excavation activities.	
Cumulative Impacts	**HAZ-9** Implementation of the 2008 LRDP would expose additional populations to emissions related to the Venoco facility.	Significant	None available	Unavoidable
	HAZ-10: Development under the proposed 2008 LRDP, in conjunction with other regional development (including the Venoco facility), would result in increased use and transport of hazardous materials as well as the potential exposure of such hazards to an increased population. Since the increase would contribute to activities outside the control of the University, the 2008 LRDP would result in a significant and unavoidable cumulative hazard or hazardous materials impact.	Significant	None available	Unavoidable
4.7 Hydrology and Water Quality				
	HYD-1 Implementation of the 2008 LRDP would result in construction activity throughout much of the Main Campus, Storke Campus, and Devereux properties. Runoff from construction	Significant	**HYD-1A** Stormwater Pollution Prevention Plans prepared for specific projects will include measures to particularly address known pollutants of concern on campus. These include metals such as copper and zinc, nitrates, phosphorous, and pesticides. Potential sources of these pollutants shall be identified for each phase of construction,	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	sites has the potential to adversely affect water quality and may hinder achievement of water quality standards in area waterways on a temporary basis.		including the post-construction scenario, and measures will be included, implemented and monitored to ensure the potential for these pollutants to reach surface or ground water, including ocean waters, is reduced to the maximum extent practical. Measures may include, but are not limited to: • Limiting or prohibiting application of copper and other decorative finishes • Limiting or eliminating sandblasting, pressure washing, where copper or zinc finishes are present.	
	HYD-2 Implementation of the LRDP will result in the construction of additional buildings, roadways, parking areas and other impervious surfaces that will increase the volume and velocity of surface runoff which, in turn, may result in violations of surface water quality standards.	Significant	**HYD-2A** The University shall install and maintain technologies effective at removing sediments and otherwise treating runoff, including Continuous Deflective Separation devices or similar technologies. Technologies selected shall reduce particulate matter. **HYD-2B** Proposed storm drain improvements shall be sized appropriately to convey runoff resulting from a 25-year storm after buildout of the 2008 LRDP has occurred. Proposed sewer line improvements shall accommodate buildout of the 2008 LRDP.	Less than significant
	HYD-3 Implementation of the 2008 LRDP will result in the construction of buildings, roadways, parking areas and other impermeable surfaces which, in turn, will alter infiltration and groundwater recharge patterns.	Less than significant	None required	Less than significant
	HYD-4 Implementation of the 2008 LRDP will result in the construction of additional buildings, roadways, parking areas and other impervious surfaces that will increase the volume and velocity of surface runoff which in turn could result in erosion or flooding on- or off-site.	Flooding – Less than significant Erosion - Significant	**HYD-4A** Implement Mitigation HYD-2A **HYD-4B** Implement Mitigation HYD-2B	Less than significant
	HYD-5 Implementation of the 2008 LRDP will result in the construction of additional buildings and	Less than significant	None required	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	other facilities which could expose people and/or property to the effects of flooding.			
	HYD-6 Implementation of the 2008 LRDP will result in the construction of additional buildings and other facilities which could subject people and/or property to the risk of inundation from a tsunami event or seiche.	Significant	**HYD-6A** Maintain TsunamiReady compliance, or equivalent procedures to provide and document communication, readiness, and evacuation procedures to address tsunami events.	Less than significant
Cumulative Impacts	**HYD-7** Implementation of the 2008 LRDP, in conjunction with other development in the region, would increase impervious surfaces within study area watersheds which in turn will increase the volume and velocity of storm water runoff. Implementation of the 2008 LRDP would contribute to cumulative impacts related to receiving water quality, flooding conditions, or erosion patterns, except as described for the campus.	Significant	**HYD-7A** Implement Mitigation HYD-1A, HYD-2A, HYD-2B	Less than significant
4.8 Land Use and Planning				
	LU-1 The 2008 LRDP would not conflict with the Santa Barbara County Comprehensive Plan and Local Coastal Program.	Less than significant	None required	Less than significant
	LU-2 The 2008 LRDP, as it applies to campus lands within the City of Santa Barbara, does not conflict with the City's General Plan and Local Coastal Program.	Less than Significant	None required	Less than significant
	LU-3 The 2008 LRDP does not conflict with the City of Goleta General Plan/Coastal Plan.	Less than significant	**LU-3A** Implement LRDP Mitigation Traffic-1A	Less than significant
	UL-4 The 2008 LRDP does not conflict with the adopted Airport Land Use Plan for the Santa	Less than significant	None required	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	Barbara Municipal Airport.			
	LU-5 Implementation of the 2008 LRDP would not result in the development of land uses that are substantially incompatible with existing or planned land uses.	Less than significant	None required	Less than significant
	LU-6 Implementation of the 2008 LRDP would not physically divide an existing community.	Less than significant	None required	Less than significant
Cumulative Impacts	**LU-7** Development under the 2008 LRDP, together with the cumulative impacts of other regional growth, would not result in the development of land uses that are substantially incompatible with existing adjacent land uses or planned uses in the surrounding area.	Less than significant	None required	Less than significant
4.9 Noise				
	NOISE-1 Development under the LRDP would expose existing and newly constructed sensitive noise receptors surrounding and within the LRDP project area to temporary construction-related noise impacts, resulting in a direct short-term impact. Construction of individual projects could temporarily produce noise levels ranging from 70 to 95 dBA at 50 feet from the source, thereby affecting adjacent sensitive land uses.	Significant	**NOISE-1A** Prior to initiation of construction of a specific development project, the Campus shall approve a construction noise mitigation program that shall be implemented for each construction project. This shall include but not be limited to the following: • Construction equipment used on campus is properly maintained and has been outfitted with feasible noise-reduction devices to minimize construction-generated noise. • Stationary noise sources such as generators or pumps are located at least 100 feet away from noise-sensitive land uses as feasible. • Laydown and construction vehicle staging areas are located at least 100 feet away from noise-sensitive land uses as feasible. • Whenever possible, academic, administrative, and residential areas that will be subject to construction noise will be informed in writing at least a week before the start of each	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			construction project. • Loud construction activity (i.e., construction activity such as jackhammering, concrete sawing, asphalt removal, and large-scale grading operations) within 100 feet of a residential or academic building shall not be scheduled during finals week. • Loud construction activity as described above within 100 fee of an academic or residential use shall, to the extent feasible, be scheduled during holidays, Thanksgiving break, Christmas break, Spring break, or Summer break. • Loud construction activity within 100 fee of a residential building shall be restricted to the hours between 7:30 AM and 7:30 PM, Monday through Saturday. • Loud construction activity within 100 feet of an academic building shall be scheduled to the extent feasible on weekends.	
	NOISE-2 Development under the LRDP could expose newly constructed sensitive noise receptors within the LRDP project area to outdoor noise levels in excess of 65 dBA Ldn associated with the Santa Barbara Municipal Airport.	Significant	**NOISE-2A** Implement existing Santa Barbara County Airport Land Use Commission policies.	Less than significant
	NOISE-3 Development occurring under the LRDP would expose existing and newly constructed sensitive noise receptors surrounding and within the LRDP project area to outdoor noise levels in excess of 65 dBA Ldn associated with vehicle traffic.	Significant	**NOISE-3A** The University shall develop a comprehensive Noise Reduction Program that includes traffic noise reduction measures such as Traffic Management, Vehicle Volume Reduction, Quiet Pavement Techniques, Site Design, and Site Specific Acoustical Analysis.	Less than significant
	NOISE-4 Development occurring under the LRDP may expose existing and newly constructed sensitive noise receptors surrounding and within the LRDP project area to outdoor noise levels in	Significant	**NOISE-4A** Equipment Maintenance. The Campus shall require that new and existing heating, ventilation, and air conditioning equipment and other commercial/industrial equipment be adequately maintained in proper working order so that noise levels emitted by such equipment remain minimal.	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	excess of 65 dBA Ldn associated with stationary sources.		**NOISE-4B** Limits on Truck Deliveries and Other Activities. The Campus shall require commercial and industrial uses in close proximity to residential areas to restrict the hours of truck deliveries and trash pickups to minimize disruption to nearby residences, where feasible. **NOISE-4C** Special-Event Noise Control. For all special events where the proposed event or activity is expected to generate significant noise in close proximity to sensitive receptor locations, the Campus shall impose limitations on the hours of the event or activity.	
4.10 Population and Housing				
	POP-1 Buildout under the 2008 LRDP would not directly induce substantial population growth in the area due to the provision of adequate housing on campus.	Less than significant	None required	Less than significant
	POP-2 Housing opportunities may not keep pace with increases in either enrollment and/or new employees anticipated under the 2008 LRDP. Although at buildout the 2008 LRDP provides adequate housing for all new campus-affiliated population, any given year may see imbalances in the housing supply compared to additional population.	Significant	**POP-2A** The University shall work towards achieving the following housing development goal: Provide housing for each added increment of new enrollment within four years. The University shall track progress towards achieving this goal on an annual basis through reporting on the numbers of housing and enrollment for the prior academic year and projections for the current academic year. The annual reports shall contain the following information: • Total student headcount for the past academic year and projected increase during the current academic year. • Total student housing units on campus for the past academic year and projected new housing to be constructed during the current academic year. • Relationship of new and total number of to the number of student housing units that exist and are planned to be constructed within four years. • Total enrollment for the past academic year and projected increase during the current academic year.	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			• Total faculty/staff units for the past academic year and projected new units to be constructed during the current academic year. • Relationship of projected enrollment increases to the number of beds that exist and are planned to be constructed within four years. A finding in any given year that the University is not making sufficient progress towards the above-stated goal shall require taking some or all of the following measures to increase progress: • Review area housing supply for students and families. If there is an identified shortfall: • Accelerate planning for on-campus housing Cooperate with real estate interests for provision of housing off-campus.	
	POP-3 Indirect growth associated with the 2008 LRDP would contribute to a demand for housing that, when combined with demand created by other growth in the county, would exceed the supply.	Significant	**POP-3A** Implement POP-2A (see above).	Unavoidable
4.11 Public Services				
	PUB-1 On-campus development and an increase of on-campus population under the 2008 LRDP would result in an increased demand for campus law enforcement services and facilities.	Less than significant	None required	Less than significant
	PUB-2 The increase of on-campus population under the 2008 LRDP has the potential to result in an increase in demand on the Santa Barbara County Sheriff's Department and the California Highway Patrol, including their respective services and facilities.	Less than significant	None required	Less than significant
	PUB-3: On-campus development and an increase of on-campus population under the 2008	Significant (except for construction-related	**PUB-3A**: The University shall pay its proportionate share of the cost of mitigating the significant environmental effects associated with constructing or expanding	Unavoidable (except for construction-related impacts)

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	LRDP has the potential to result in environmental impacts associated with expansion to meet an increased demand on the Santa Barbara County Fire Department services and facilities.	impacts)	Santa Barbara County Fire Department facilities necessary to serve the campus; or the University shall reserve for lease approximately one acre of land near the current site of Station 17 for any new or expanded facility the County chooses to construct. The land to be provided is designated for construction under the LRDP; and the impacts of constructing the fire station expansion are mitigated in this EIR. **PUB-3B**: Because sprinklering buildings offers an increased margin of safety for occupants, the University shall continue to install fire suppression sprinklers in all new buildings over 5,000 square feet in order to reduce the demand for fire suppression service.	
	PUB-4 On-campus staffing level growth under the 2008 LRDP could cause increased public school enrollment which could require new or expanded facilities. The construction or expansion of such facilities has the potential to cause significant environmental impacts.	Less than significant	None required	Less than significant
	PUB-5 On-campus population growth under the 2008 LRDP would increase demand for library facilities; however, the construction of on-campus library expansions would satisfy the demand.	Less than significant	None required	Less than significant
Cumulative Impacts	**PUB-6** Growth of the campus under the 2008 LRDP, in conjunction with other regional growth, has the potential to result in increased demand for new or expanded police and fire service facilities. The development of new facilities could result in significant environmental impacts.	Less than significant	None required	Less than significant
	PUB-7 Growth of the campus under the 2008 LRDP, in conjunction with other regional growth, may result in increased	Significant	**PUB-7A** The University shall track the number of school-age children living in University housing in order to determine whether these children are contributing to school overcrowding that requires GUSD to	Unavoidable

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	demand for new or expanded elementary school facilities beyond the current capacity of the District. Physical environmental impacts associated with the facility construction or expansion to meet the increase in demand to the Isla Vista Elementary School would be a less than significant impact.		construct new school facilities. The University shall pay its proportionate share of the cost of mitigating the significant effects on the environment with the construction or expansion of the Isla Vista Elementary School; or the University shall reserve for lease up to one acre of land (located immediately west of the school near the University day care facility) for expansion of the School. The land to be provided is designated for construction under the LRDP; and the impacts of constructing the school expansion are mitigated in this EIR.	
4.12 Recreation				
	REC-1 Implementation of the 2008 LRDP will result in increase in population, increasing the demands on recreational facilities on-campus.	Less than significant	None required	Less than significant
	REC-2 Implementation of the 2008 LRDP would increase populations near recreational resources on- and off-campus, particularly local beaches, which could result in the deterioration of the existing facilities.	Significant	**REC-2A** The University shall phase the construction of recreational facilities and playfields for each added increment of new enrollment. This additional recreation capacity will be available within four years of the enrollment increase. **REC-2B** The University will continue to maintain adjacent beaches and coastal access trails for the use of all members of the public. These are: • UCSB Beach • Depressions Beach • West Campus Beach • West Campus Bluffs Trail • Dune Pond Trail • Lagoon Trail • Campus Point access near aquarium **REC-2C** In order to reduce the demand upon nearby County parks, the University will also provide recreation facilities in new housing developments, including the provision of tot lots and adult exercise facilities.	Less than significant
	REC-3 Implementation of the 2008 LRDP will result in impacts to coastal access points and coastal recreational resources.	Significant	**REC-3A** Implement Mitigation REC-2B	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
Cumulative Impacts	**REC-4** Cumulative population growth in the study area may result in increased use of on and off-campus recreational facilities. Increased use may require improvements to existing facilities and the construction of new recreational facilities both of which have the potential to result in significant environmental impacts.	Significant	**REC-4A** Implement Mitigation REC-2A, 2B and 2C.	Unavoidable
4.13 Transportation and Circulation				
	TRAFFIC-1: The proposed UC Santa Barbara LRDP would increase peak hour traffic volumes using City of Goleta intersections resulting in unacceptable LOS conditions under cumulative plus project conditions.	Significant	**TRAFFIC-1A** UC Santa Barbara shall: (1) Enhance and promote existing transportation demand management measures and develop new measures to reduce travel by single occupant vehicles to achieve an overall reduction of 10% of trips to and from campus (measured against the anticipated LOS in Tables 4.13-30 & 4.13-31). (2) Construct on-campus roadway and intersection improvements to best meet a balance of congestion, delay, safety, and campus character objectives. The balance is necessary to accommodate all forms of transit, including pedestrian, bicycle, bus and car. On-campus roadways will be maintained at the LOS or better then that identified for each in Table 4.13-35. If any of these intersections degrade below the LOS identified, the campus will implement improvements, such as signalization, turning lanes and other controls. (3) Continue to work with Santa Barbara County to create new roadway connections between Isla Vista and the Main Campus. (4) Every three years monitor traffic conditions on campus and at impacted nearby City and County intersections and roadways. Monitoring will include the intersections and roadways analyzed in the traffic modeling effort for this EIR, specifically those set forth in Table 4.13-33 & 4.13-34. (5) Work with the Cites, County, SBCAG, and SBMTD and other transit providers to determine appropriate transportation	Unavoidable

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			improvements, for providing mitigating offsets to increased traffic (e.g. transit stops, bicycle paths, transit subsidies). (6) Contribute to the City of Goleta and County of Santa Barbara the University's proportionate share of mitigating significant impacts to intersections and roadways identified in Tables 4.13-33 & 4.13-34 due to 2008 LRDP traffic increases. Contributions made by the University that exceed its proportionate share of the cost of mitigating a particular impact or that mitigates more than its impact will be credited towards mitigation by the University of future impacts. Contributions will be made at the time the construction contract for the improvement is awarded by the entity making the improvement. Intersections to monitor include: • Hollister Ave/Storke • Phelps/Storke • US 101 NB ramps/Calle Real/Storke • US 101 SB ramps/Los Carneros • Hollister Ave/Los Carneros • US 101 NB & SB ramps/Fairview • Hollister/Fairview • Hollister/Oatterson • Mesa/Los Carneros • El Colegio/Camino Corto Contribution will include one or more of the following: • Alt. transportation enhancements • Payment of GTIP fees • Payment towards or construction of all or a portion of specific roadway improvements (especially those that directly benefit University related transportation)	
	TRAFFIC-2: The proposed UC Santa Barbara LRDP would increase peak hour traffic volumes using Santa Barbara County intersections resulting in unacceptable LOS conditions under cumulative plus project conditions.	Significant	**TRAFFIC-2A** See Traffic-1A above.	Unavoidable
	TRAFFIC-3 The proposed UC Santa Barbara LRDP (with and without the	Less than significant	**TRAFFIC-3A** UC Santa Barbara shall provide a balanced transportation system on campus, offering vehicular, bicycle,	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	proposed roadway improvements) would increase peak hour traffic volumes on campus resulting in increased congestion during peak travel hours		pedestrian, and transit mobility. UC Santa Barbara shall consider intersection and roadway improvements as individual projects are constructed that require additional roadway capacity. Roadway improvements shall not conflict with existing or planned pedestrian and bicycle facilities or degrade mobility for pedestrians and bicyclists traveling on campus. Roadways on campus shall be maintained at a LOS no worse than as shown on Table 4.13-35.	
	TRAFFIC-4: The proposed UC Santa Barbara LRDP would increase daily traffic volumes using City of Goleta roadways resulting to unacceptable LOS conditions under cumulative plus project conditions.	Significant	**TRAFFIC-4A** See Traffic-1A above.	Unavoidable
	TRAFFIC-5: The proposed UC Santa Barbara LRDP would increase daily traffic volumes using Santa Barbara County roadways resulting in unacceptable LOS conditions under cumulative plus project conditions.	Significant	**TRAFFIC-5A** See Traffic-1A above.	Unavoidable
	TRAFFIC-6: The proposed UC Santa Barbara LRDP would increase peak hour traffic volumes on Caltrans freeway facilities resulting in unacceptable LOS conditions under cumulative plus project conditions.	Significant	**TRAFFIC-6A** See Traffic-1A above.	Unavoidable
	TRAFFIC-7: The proposed UC Santa Barbara LRDP would increase bicycle and pedestrian travel on campus, modify existing bicycle facilities, and provide additional bicycle and pedestrian facilitates to serve planned development.	Significant	**TRAFFIC-7A** UC Santa Barbara shall continue to provide an extensive bicycle and pedestrian network on campus and monitor conflicts between the various modes of travel on campus.	Less than significant
	TRAFFIC-8 The proposed UC Santa Barbara LRDP	Less than significant	**TRAFFIC-8A** UC Santa Barbara shall work with the Santa Barbara Metropolitan	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	would increase transit ridership in the vicinity of campus.		Transit District in conjunction with the City of Goleta and Santa Barbara County to determine the appropriate transportation improvements, such as roadway widening, improved bicycle and pedestrian facilities, or enhanced transit service, to accommodate campus growth proposed under the LRDP.	
	TRAFFIC-9 The proposed UC Santa Barbara LRDP would increase parking demands on campus primarily for new student, faculty, and staff residents.	Less than significant	**TRAFFIC-9A** UC Santa Barbara shall provide residential parking on campus as proposed in the LRDP and continue to conduct yearly parking surveys to monitor parking utilization rates for on-campus parking lots.	Less than significant
	TRAFFIC-10 The proposed UC Santa Barbara LRDP would increase parking demands in Isla Vista.	Significant	**TRAFFIC-10A** UC Santa Barbara shall contribute its fair-share towards the implementation of a parking permit program in Isla Vista.	Unavoidable
4.14 Water				
	W-1 The provision of additional water to serve buildout of the Main Campus, Storke Campus, West Campus, Devereux Foundation property, and North Campus as envisioned by the 2008 LRDP will require the construction of suitably-sized water lines, and/or the replacement of existing water lines over the timeframe of the LRDP.	Significant	**W-1A** Mitigation is discussed in the following topical sections: 4.2 Air Quality, 4.3 Biological Resources, 4.4 Cultural Resources, 4.6 Hazards and Hazardous Materials, 4.7 Hydrology and Water Quality, 4.5 Geology, Soils and Geotechnical, 4.9 Noise, and 4.13 Traffic. Construction-related mitigation measures include: ▪ AIR-7A ▪ BIO-1; A-D ▪ BIO-2; A-B ▪ BIO-3; A-B ▪ CULT-1; A-M ▪ CULT-2; A-I ▪ CULT-3; A-F ▪ CULT-4; A-D ▪ GEO-1 ▪ GEO-4 ▪ HAZ-6; A-B ▪ HAZ-8; A-B ▪ HYD-1; A ▪ HYD-5; B ▪ NOISE-3A ▪ NOISE-4A	Less than significant
	W-2 Development accommodated by the 2008 LRDP, in conjunction with additional development within the area served by GWD, may	Less than Significant	None required	Less than Significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	necessitate the pumping of additional groundwater from the Goleta Groundwater Basin			
	W-3 Development accommodated by the 2008 LRDP, in conjunction with additional development within the service area of GWD, would increase the cumulative demand for potable water during normal and dry years beyond the total supplies (surface and groundwater) available to GWD in a normal runoff year..	Significant	**W-3A**: The University shall negotiate additional water allotments and/or acquire rights to additional water beyond that currently owned by GWD as necessary to serve UCSB potable water demand. W-3B: New UCSB development shall make use of recycled water to the maximum extent feasible. Recycled water will be used in some or all of the following ways: use of recycled water for bathroom fixtures and irrigation. W-3C: Individually meter or sub-meter all new living units or buildings. Institute water charges on a per unit basis with a graduated fee structure. W-3D: The University shall install water saving devices in all buildings and facilities, new or existing that do not currently have them, and shall continue to use existing water saving devices. The water saving devices that will be installed shall include, but will not be limited to, the following: shower heads, toilets, urinals, washing machines and irrigation systems. W-3E: The University shall maintain a public awareness campaign on campus and in campus residential facilities for saving water. All dormitory residents shall be required to receive annual training on water conservation. W-3F: The University shall develop a UC Santa Barbara Water Conservation Program for managing it water demand that includes: • Measures that reduce current and future water demand, including the measures set forth in Mitigation Measures W-3B through W-3E. • Measures for systematic water use reductions during multiple dry years. W-3G: If sufficient additional water supplies cannot be acquired from GWD, the State Water Project or other available supply for all of the development envisioned under the 2008 LRDP, the University shall halt further development under the LRDP in the affected campus water service area so that water	Less than Significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
			demand remains within the available supply for that service area unless and until additional supplies can be acquired. Additional development shall be halted when either of the following circumstances exist. 1. When potable water demand is projected to be within 50 AFY of the available supply for the areas governed by Permit 14. 2. When potable water demand is projected to be within 10 AF of available supplies for the Santa Catalina Residence Hall water service area. This measure shall be administered by conducting project-specific water availability analyses for each proposed, new building. At the time that a new UCSB building is proposed, and before environmental review is complete, the University shall meet with GWD and ascertain that supplies are available from the district.	
4.15 Wastewater				
	WW-1 Implementation of the 2008 LRDP will increase wastewater flows to the Goleta Wastewater Treatment Plant via conveyance systems owned by the University, the Goleta Sanitary District, and the Goleta West Sanitary District. However, wastewater flows associated with buildout of the 2008 LRDP, along with buildout of projected development within the service area of both agencies, would not exceed the design capacities of the treatment plant or the wastewater conveyance systems. Wastewater from the project would not exceed treatment requirements of the Central Coast Regional Water Quality Control Board	Less than significant	**WW-1A** The University will request that the Goleta Sanitary District and Goleta West Sanitary District make application to the Regional Water Quality Control Board to modify or re-issue each District's National Pollution Discharge Elimination Permit for the wastewater treatment plant as necessary to accommodate the equivalent of a 1 percent average annual enrollment growth rate. **WW-1B** The University will negotiate the acquisition of additional design capacity in the Goleta Sanitary District wastewater treatment plant as necessary to accommodate the equivalent of a 1 percent average annual enrollment growth rate.	Less than Significant
	WW-2 The 2008 LRDP would require the replacement of existing pipelines and utility	Significant	WW-2A Mitigation is discussed in the following topical sections: 4.2 Air Quality, 4.3 Biological Resources, 4.4 Cultural Resources, 4.6 Hazards and Hazardous	Less than significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	conduits. Upgrades may be required for wastewater. Much of the installation work would be contemporaneous with the development of projects under the LRDP, and impacts will be part of the overall construction effort.		Materials, 4.7 Hydrology and Water Quality, 4.5 Geology, Soils and Geotechnical, 4.9 Noise, and 4.13 Traffic. Construction-related mitigation measures include: ▪ AIR-7A ▪ BIO-1; A-D ▪ BIO-2; A-B ▪ BIO-3; A-B ▪ CULT-1; A-M ▪ CULT-2; A-M ▪ CULT-3; A-F ▪ CULT-4; A-D ▪ GEO-1 ▪ GEO-4 ▪ HAZ-6; A-B ▪ HAZ-8; A-B ▪ HYD-1; A ▪ HYD-5; B ▪ NOISE-3A ▪ NOISE-4A	
4.16 Other Utilities				
	UTIL-1 Implementation of the 2008 LRDP would result in an increase in solid waste to be disposed at landfills serving the University. The impact of additional solid waste on landfill capacity is considered significant and unavoidable.	Significant	**UTIL-1A** The University will continue its program of recycling and waste diversion. **UTIL-1B** Implement the recommendations of the Multi-jurisdictional Solid Waste Task Group (Task Group), including following: • Expansion of Existing Commercial Recycling Programs • Increased Collection of Electronic Waste (Statewide mandate) Development of a New Household Hazardous Waste Facility • Consideration of Construction and Demolition Waste Recycling Ordinances • Development of a New Clean Material Recovery Facility on the South Coast • Development of a Food Waste Collection and Processing Program • Development of a New Waste Conversion Facility • Development of a Dirty Material Recovery Facility and Corresponding Composting Facility Should the Development of a Waste Conversion Facility Become Infeasible	Unavoidable
	UTIL-2 The 2008 LRDP would require the replacement of existing pipelines and utility conduits. Upgrades may be required for energy utilities, fire flow, heating	Significant	**UTIL-2B** Mitigation is discussed in the following topical sections: 4.2 Air Quality, 4.3 Biological Resources, 4.4 Cultural Resources, 4.6 Hazards and Hazardous Materials, 4.7 Hydrology and Water Quality, 4.5 Geology, Soils and Geotechnical, 4.9 Noise, and 4.13 Traffic. Construction-	Less than Significant

Summary of Impacts and Mitigation				
Issue Area	Impact	Level of Significance Prior to Mitigation	Mitigation	Residual Level of Significance
	and cooling system water, seawater systems and telecommunications, which may result in construction impacts. Much of the installation work would be concurrent with the development of projects under the LRDP, and impacts will be part of the overall construction effort		related mitigation measures include: ▪ AIR-7A ▪ BIO-1; A-D ▪ BIO-2; A-B ▪ BIO-3; A-B ▪ CULT-1; A-M ▪ CULT-2; A-I ▪ CULT-3; A-F ▪ CULT-4; A-D ▪ GEO-1 ▪ GEO-4 ▪ HAZ-6; A-B ▪ HAZ-8; A-B ▪ HYD-1; A ▪ HYD-5; B ▪ NOISE-3A ▪ NOISE-4A	
	UTIL-3 Implementation of the 2008 LRDP would increase the demand for electricity and natural gas resources.	Less than Significant	None Required	Less than Significant

June 10, 2008

Alissa Hummer
UCSB Campus Planning and Design
Santa Barbara, CA 93106-1030

RE: Draft EIR for the University of California, Santa Barbara's Long Range Development Plan 2008 Update

Dear Ms. Hummer,

The City of Santa Barbara Planning Commission and Staff have reviewed the 2008 UCSB Long Range Development Plan (LRDP) and associated Draft Environmental Impact Report (DEIR) dated March 2008 and have the following comments for your consideration.

It is our understanding that UCSB (the University) is proposing to update its 1990 LRDP. The new 2008 LRDP would serve as a "general plan" for the campus, guiding land use and physical improvements to accommodate growth through the year 2025. It is also our understanding that the University intends to forward this new document to the California Coastal Commission for review and approval to satisfy the requirements of the California Coastal Act of 1976. The 2008 LRDP would, therefore, serve as the standard of review for future Notices of Impending Development issued by the University and reviewed by the Coastal Commission.

The 2008 LRDP proposes to increase enrollment at the University from 20,000 students to 25,000 students at an approximate rate of 1% a year until 2025. In this time frame, the University is planning to hire 336 additional faculty and 1,400 additional staff for a total of 1,400 faculty and 5,031 staff. Approximately 2.5 million additional gross square feet of new academic and research facilities would be added to the approximately 3.8 million gross square feet of facilities on campus today. The University is also proposing extensive redevelopment and new development of on-campus housing. An additional 5,443 bed-spaces and 239 student family units are proposed to house enrolled students. At final buildout, approximately 52% of students would be provided with on-campus housing. An additional 1,874 additional faculty and staff housing units are also proposed. At final buildout, approximately 33% of faculty and staff would be provided on-campus housing. The University is also proposing several modifications to various land use and resource policies previously included in the 1990 LRDP and subsequent amendments.

Our comments on the 2008 LRDP and associated DEIR are outlined in detail in the attached document by issue category. These comments center around several major issue areas:

- The need for required enrollment and hiring caps in the 2008 LRDP that could only be modified after additional environmental analysis is conducted for the

accommodation of additional students, faculty, staff, and indirect growth associated with the University.

- The need for the University to adhere to a phasing schedule for the 2008 LRDP which would assure that enrollment increases do not occur prior to availability of resources (i.e. water), implementation of mitigation measures, and construction and availability of on and off-campus housing and facilities to adequately serve new students, faculty, and staff.

- Concern with development of housing and other sensitive land uses within areas surrounding the Santa Barbara Airport that are subject to elevated noise levels.

- Effective mitigation of the many traffic and transportation impacts identified in the DEIR, including significant impacts to transit systems and intersections used by patrons and employees of the Santa Barbara Airport.

- Concern over the removal from the 1990 LRDP of several policies that ensure the protection and enhancement of biological habitats and water quality on campus, including the Storke Wetlands and adjacent Goleta Slough.

- The need for a cumulative impact analysis that considers the impacts (traffic, air quality, water, housing demand, etc) of approximately 200 full time equivalent staff/faculty positions currently at the University that were not considered in the 1990 LRDP and associated EIR and are assumed to be "existing conditions" in the 2008 LRDP and March 2008 DEIR.

UCSB is an integral part of regional issues, resource allocation, and planning in the south coast area. We commend the University's efforts in the last few years to work with the City, County, and other regional governments toward collaboration on many of these issues. We also support the University's endeavor to provide additional on-campus housing for students and employees of the University. Resource availability in the Goleta Valley area must be shared between the University, City of Goleta, County of Santa Barbara and the City of Santa Barbara Airport. We would, therefore, encourage establishing a formal agreement similar to those formulated for the 1990 LRDP between these agencies and other relevant parties for regional cooperation and participation in the various issues brought up by the new 2008 LRDP.

We wish to acknowledge that the University is a tremendous asset to the community. The City of Santa Barbara is very interested in seeing UCSB succeed as an academic institution. We are willing to work with the University in any way possible to maintain and enhance the goals of University, while also protecting our resources and the quality of life on the south coast.

If you have any questions or concerns about our comments, please direct them to Melissa Hetrick, Environmental Analyst for the City of Santa Barbara at (805) 564-5470 or

MHetrick@SantaBarbaraCA.gov. Thank you for the opportunity to comment on the Draft LRDP and EIR. We ask that you continue to keep us informed about the development and implementation of these documents.

Sincerely,

Paul Casey
Community Development Director

George C. Myers
Chair, Planning Commission

Cc: Mayor and Council
Planning Commission
Goleta Slough Management Committee
Jim Armstrong, City Administrator
Christine Andersen, Public Works Director
Karen Ramsdell, Airport Director
Jan Hubbell, Senior Planner
Bettie Weiss, City Planner
John Ledbetter, Principal Planner
Laurie Owens, Project Planner
Andrew Bermond, Associate Planner
Rob Dayton, Principal Transportation Planner
Stacy Wilson, Transportation Planner
Debra Andaloro, Senior Planner
Melissa Hetrick, Environmental Analyst
Barbara Shelton, Environmental Analyst
Steven Faulstich, Housing and Redevelopment Manager
Steve Chase, Director of Planning and Environmental Services, City of Goleta
Kevin Walsh, General Manager, Goleta Water District
John McInnes, Long Range Planning Director, County of Santa Barbara
Jamie Goldstein, Deputy Director, Santa Barbara County Redevelopment Agency
Michael Powers, Deputy Director, Santa Barbara County Association of Governments

City of Santa Barbara Comments on the UCSB 2008 LRDP and DEIR

Enrollment

The University is proposing to increase enrollment by 5,000 students with a 1% increase in enrollment proposed each year. Additionally the University proposes to hire 1736 faculty and staff by 2025. While the 2008 LRDP and DEIR consider this the worst case growth scenario, there are no policies or requirements in these documents that ensure that the University will cap enrollment/hiring at these numbers or adhere to the proposed phasing of enrollment. Presumably, with an approximate 67% increase in assignable square feet (asf) of academic and research facilities on campus, there could be up to 67% additional students with commensurate staff, faculty and indirect "multiplier effect" households. Without enrollment caps, it is unknown what the true worst case scenario may be, the extent of potential impacts, or how effective proposed mitigation measures may be that are identified in the DEIR. The overall number of students and the phasing and timing of enrollment increases could have significant impacts on City of Santa Barbara (City) and regional resources, including housing, water, public services, and traffic, as discussed below. It is critical for the purposes of City and regional planning and adequate environmental analysis that the University guarantees that there will be no more than 25,000 students at the University through the year 2025. Additionally, it is important that the University commits to a schedule which assures that enrollment increases not occur prior to availability of resources, implementation of mitigation measures, and construction and availability of housing and on-campus facilities to adequately serve new students, faculty, and staff.

We, therefore, request that policies be added to the 2008 LRDP and mitigation measures added to the EIR that require enrollment and hiring caps and scheduled phasing of growth at the University. Additionally, we would ask the University to consider formulation of a new agreement between the University, the City of Santa Barbara, City of Goleta, County of Santa Barbara, and other interested parties similar to the Mitigation Implementation Agreement and Cooperative Relations Agreement signed in 1991 that would address enrollment phasing and caps for the 2008 LRDP.

Facilities Development

The City offers the following comments on non-residential development proposed in the 2008 LRDP:

- The 1990 LRDP proposed an increase of 1.21 million assignable square footage (ASF) of non-residential development over the 1990 baseline of 2.9 million ASF. However, the current ASF for non-residential development for UCSB according to Table 3.0-6 in the DEIR is 2.7 million ASF. Please explain this discrepancy between the 1990 document and 2008 draft.

- Please explain why a 67% increase in ASF for research, academic, and support facilities proposed in the 2008 LRDP is necessary to accommodate a 25% increase in students.

- Please explain how ASF is calculated and the purpose of this measurement for the purpose of planning in the 2008 LRDP. How does ASF differ from gross square feet (GSF)? Given that most jurisdictions use gross square feet as a frame of reference, it would be helpful if discussions in the EIR and 2008 LRDP concerning ASF also include corresponding information regarding GSF.

Housing and Public Services

According to the DEIR, 46% of faculty and staff and 7% of the students at UCSB are currently residing within the City. UCSB, as the largest employer in the south coast area, plays a significant role in the demand for housing in the City through not only its faculty, staff, and students, but also through incidental growth associated with the expanding University. As the University is well aware, there are significant local concerns with the affordability of housing and diminished housing to jobs ratios in the Santa Barbara area. Given the lack of housing affordable to low and moderate income households, high land and construction costs, and other limiting factors, it is assumed that provision of adequate and affordable housing in the region will continue to fall short of demand in the future. The City's planning process to date has projected buildout of additional units in the City of Santa Barbara in order to provide for the housing demands resulting from the jobs created by the buildout of non-residential development within the City and to correct the existing jobs/housing imbalance in the City. It has not been assumed in our planning process that the City would need to provide new units to offset the demand for housing resulting from new development at UCSB. Similarly, the City has not assumed that resources, including water and sewer capacity, would be needed to accommodate any additional units. It is critical, therefore, that UCSB recognize the importance of affordable housing and that the University effectively mitigates to the extent feasible all of its impacts to housing, public services, and resources in the region.

We commend the University's efforts in the last few years to work with the City, County, and other regional governments on regional housing issues. We are also very supportive of the University providing additional on-campus housing for students and employees of the University. However, we are concerned that the demolition of existing on-campus housing, construction of new on-campus housing, enrollment increases, and hiring of faculty and staff are timed appropriately to minimize impacts to the region's housing market. The 2008 LRDP and DEIR encourage UCSB to phase housing demolition and construction to coincide with housing needs as enrollment and hiring increases. However, there are no requirements that the University provide new housing before increasing enrollment or hiring new employees. The DEIR acknowledges through Impact POP-2 that there could potentially be periods of large housing deficits on campus should there be scenarios where enrollment increases, existing on-campus housing is demolished for reconstruction, and no new housing is yet ready for occupancy.

The measures proposed to mitigate this impact (LRDP Mitigation POP-2A), require the University to monitor enrollment, hiring, and housing levels and cooperate with real estate interests for provision of off-campus housing. These measures would procure housing for new faculty, staff, and students from existing housing stocks, which are already very limited. Additionally, the provision for annual reports to monitor enrollment may be incongruent with the *Sundstrom v. County of Mendocino* (1998) which ruled that mitigation consisting of further studies are inadequate. There are no requirements in the 2008 LRDP or DEIR for any type of effective action (i.e. freezes on enrollment, reevaluation of the 2008 LRDP, etc) if monitoring shows a housing imbalance. There are also no requirements proposed that the University limit enrollment or reevaluate the 2008 LRDP if it turns out that site constraints (reduced height limits, biological and archeological resources, etc.) limit the overall projected amount of on-campus housing that will be available. It is our opinion, therefore, that the proposed mitigation measures in the DEIR do not mitigate Impact POP-2 to a less than significant level.

The University either needs to ensure effective phasing of housing and enrollment so that there is no housing deficit and/or ensure affordable off-campus housing will be available to students/faculty/staff through coordination with neighboring jurisdictions, contributions to affordable housing projects off campus, or implementation of third party affordable housing programs. These assurances should be effectuated through mitigation measures in the EIR and specific policies in the 2008 LRDP that require these mitigations prior to increases in enrollment or hiring of faculty and staff. Additionally, we encourage the University to formulate a negotiated agreement with the City and other neighboring jurisdictions addressing the issue of affordable housing demand created by the 2008 LRDP.

The following are additional comments on the DEIR and 2008 LRDP in the areas of housing and public services:

- Implementation of the 2008 LRDP would increase enrollment by 5,000 students and include the addition of over 5,443 new bed spaces and 239 units for students on campus. However, it is unclear in both the DEIR and 2008 LRDP if the mix of undergrad vs. graduate student housing units being created matches the corresponding projected enrollment increases for undergrads vs. graduate students. Please clarify.

- There is no indication in the DEIR or 2008 LRDP as to the breakdown of the amount of residential units that will be for sale vs. rent and how that matches up with the percentages of owners vs. renters projected among the new and existing faculty and staff.

- Up until now, onsite employee housing units have only been offered to faculty and there is currently a long wait list to get units. The LRDP states that all faculty and staff units, with the exception of 45 units at West Campus Mesa, will be

available to staff too. However, faculty are often offered housing opportunities in their employment contracts and have historically been given preference over staff for available units. Please clarify if faculty will continue to be given preference for on-campus housing and how this may affect demand for off-campus housing for staff of the University.

- The DEIR should describe the policies that will be in place to ensure that on-campus housing continues to be used primarily by active staff and faculty of the University. What will be the specific policies concerning retirement, terminations, or resignations and retention of on-campus housing? The DEIR (Impact POP-3) addresses the possibility that retirement could impact on-campus housing supplies in the near and long term. What about terminations or resignations?

- The University had previously signed and implemented a Cooperative Relations Agreement with local jurisdictions and interests to mitigate deficits in affordable housing for staff created by the 1990 LRDP. This mitigation was to be achieved through a third party affordable housing program. What were the results of this program? How were funds disbursed? How effective was this program at mitigating the impacts of the 1990 LRDP with respect to affordable staff housing?

Water Supply

The DEIR concludes that there is a lack of available water to serve the projected enrollment and development outlined in the 2008 LRDP. This shortage of available water is a significant regional concern that needs to be effectively addressed in the 2008 LRDP and DEIR. Specifically, our comments are as follows on the issue of water supply:

- It is reasonable to assume that Goleta Water District (GWD) will be able to agree upon a new contract to provide the University with future water allocations equal to their current allocations. The analysis in the DEIR Water Supply section, however, assumes that the projected 526 AFY deficit in water allotments for the University in the future will be largely met (all but 194 AFY) through additional new allocations from the GWD. It is our understanding that the GWD has not provided any guarantee to the University that these additional allocations will, in fact, be entirely available to the University. The analysis of mitigation measures and alternatives in the DEIR evaluate the potential "worst case scenario" of a deficit of 194 AFY of water for the University. However, it would seem that without any type of agreement or guarantee from the GWD, that the worst case deficit scenario would be 526 AFY during normal years. Mitigation measures and analysis of alternatives in the EIR should be evaluated with respect to this revised worst case scenario.

- Mitigation Measure W-3A in the DEIR requires action by another public agency to provide new water allocations to the University. The University does not have the

direct authority to require the GWD to pursue other water resources or to approve the sale of water rights from another jurisdiction to the University. Therefore Impact W-3 cannot be mitigated to less-than significant with Mitigation Measure W-3A. This impact should, therefore, be considered significant and unavoidable.

- The analysis on page 4.14-12 of the DEIR assumes that, for critical dry years, the future water demand would be reduced to 91 percent of normal by means of voluntary water use reduction measures. Specifically what measures would be employed and how would the University ensure that water demand reductions are achieved without requiring these measures? Any identified water conservation measures available should be made required mitigation measures in the EIR and policies in the LRDP. Given the projected deficit in water supplies for future build out and enrollment at the University and the uncertainty of regional and state water supplies in the future, the City would encourage the University to employ any feasible water conservation measures (including use of recycled water and improvements to the reliability of that system) to the extent feasible during all years, not just critical dry years.

- The water duty factors applied to future residential development (page 4.14-14 of the DEIR) are based on water uses at the Westgate, El Dorado, and Santa Catalina residential developments. All of these developments, however, are undergraduate student housing. Given that 2,705 of the proposed 4,339 new residential units will be for "housed family" or "faculty and staff," it is unclear whether these water demand rates would accurately reflect the worst case scenario for water uses for the 2008 LRDP. Please describe the assumptions used (number of beds per unit, etc) to come up with the water demand factor used and how that compares with existing water uses at faculty, staff, and family student housing units on campus.

- On June 5, 2008, Governor Arnold Schwarzenegger proclaimed a statewide drought, warning that California's water supply is falling dangerously low because of below-average rainfall and court-ordered water restrictions aimed at protecting fish. The governor also issued an executive order intended to speed transfers of water to areas experiencing the most severe shortages, help local water districts boost conservation efforts, and identify risks to the state's water supply. The EIR should examine the impact of this proclamation and executive order, if any, on future supplies of water in the region and the potential for rationing and required reductions measures in the future.

Traffic and Transportation

The DEIR identifies several significant impacts from the 2008 LRDP to roadway systems and parking areas within the City of Goleta and County of Santa Barbara that are also used by patrons and employees of the Santa Barbara Airport. The following comments address our concerns:

- Please include the City of Santa Barbara in the discussion with the City of Goleta and the County of Santa Barbara in the allocation of proportionate share of transportation impact mitigation in Mitigation Measure TRAFFIC-1A. The City of Santa Barbara would be interested in participating in any discussions and potential future agreements to determine allocation and impact mitigation for impacted intersections. Requirements for fare share contribution to improve impacted intersections described in Mitigation Measure TRAFFIC-1A should also be included as an enforceable policy in the 2008 LRDP.

- Impact TRAFFIC-7 should also address impacts to off-campus as well as on-campus pedestrian and bicycle circulation as a result of the 2008 LRDP. Mitigation Measure TRAFFIC-7A should include fair share contributions toward improvements to those portions of the off-campus bicycle and pedestrian network impacted by the 2008 LRDP.

- Given the extent of traffic impacts identified in the DEIR, we strongly encourage the University to continue discussions with Metropolitan Transit District and local jurisdictions, including the City, to increase the frequency and expand routes for bus transport between all new residential developments, the UCSB campus, popular off-campus residential areas, and local commercial and cultural centers, including downtown Santa Barbara.

- The proposed addition of 100 parking spaces on campus does not seem adequate to accommodate an addition of 2.5 million gross square feet of academic, research, and support facility space on the campus. The EIR should address the results of any parking demand analysis done for non-residential development on campus and potential impacts there could be from this development to local parking supply and demand and public beach parking.

Noise

The County's standard for acceptable exterior noise levels for residential use is 65 dBA Ldn as described in the DEIR. This standard should apply to all on-campus housing developments. A substantial number of noise complaints received by the Airport arise from surrounding housing already within areas with existing noise levels above 65 dBA. Therefore, we would recommend addition of mitigation measures in the DEIR and policies in the 2008 LRDP that require UCSB to locate any proposed childcare and housing in areas that do not exceed the 65 dB(a) level. These measures and policies should also require attenuation methods to reduce noise impacts to residential and educational facilities in proximity to noise contours identified by the Santa Barbara County Airport Land Use Plan. The University should also notify all potential residents of on-campus housing of the potential noise generated by the Airport prior to any sale or rental of units.

Biological Resources and Water Quality

A large portion of the UCSB campus, including Storke Campus, drains into Goleta Slough. The City is interested in protecting the biological habitats and water quality of Goleta Slough and other regional biological habitats to the extent feasible. The following comments address biological and water quality concerns:

- Please include consultation with the City of Santa Barbara, Airport Department and the California Department of Fish and Game as requirements for projects that have the potential to impact the Goleta Slough (e.g. within the Slough watershed as defined in the Goleta Slough Ecosystem Management Plan) in Policies ESH-1 and ESH-10 in the 2008 LRDP.

- The previous 1980 and 1990 LRDPs contained Policy 30240(a).14 which has been excluded from the proposed 2008 LRDP. This policy requires the University to work with the City of Santa Barbara to allow tidal influx from Goleta Slough into the Storke Wetlands through the Airport's tidal gates. Given the positive results of the Goleta Slough Tidal Restoration Experiment thus far, there could be significant cumulative biological benefits and restoration potential through reintroduction of tidal influx to these campus wetlands and the associated relocation of sewer lines currently located under these wetlands. Policy 30240(a).14 should be retained in the 2008 LRDP and included as mitigation for potential wetland and biological impacts identified in the DEIR (Impact WW-2 and others).

- Several policies in the 2008 LRDP and mitigation measures in the DEIR require additional protection of water quality and biological habitats on the North and West Campuses. However, several other areas of Campus, in particular Storke Campus, are adjacent to and contain sensitive biological resources. Additionally, most areas of campus drain into the environmentally sensitive areas of Goleta Slough, Campus Lagoon, and Devereux Slough. All of these water quality and biological protection measures should be applied to the entire campus. Specifically, Policy MAR-4 requires site drainage be directed through bio-swales or other means to retain and treat stormwater from development sites only on the North and West Campuses. Policy Mar-6 encourages the restoration of wetlands on North and West Campuses. Policy ERO-1 encourages construction during the dry season on the North and West Campuses only. Finally, Policy HAZ-5 requires particular actions should contaminated soils or groundwater be found on the North and West Campuses.

- Policies 302400(b).9 and 30240(b).10 in the 1990 LRDP have not been retained in the 2008 LRDP. These policies establish building setbacks around the Storke Wetlands, protect transition habitats surrounding wetlands, and protect raptor and wildlife habitat and trees surrounding the Storke Wetland in areas directly adjacent to Goleta Slough. These policies should be retained in their entirety in the 2008 LRDP.

- The amendment to the 1990 LRDP for the North and West Campuses, as adopted by the UC Regents and Coastal Commission in 2007, incorporated several water quality and biological protection mitigation measures and policies for the entire campus into the 1990 LRDP. Several of these policies have been excluded from the 2008 LRDP. The omitted policies address buffers and setbacks for wetlands and environmentally sensitive habitat areas, mitigation ratios for habitat disturbance, protection of sensitive bird and raptor habitats, minimization of development in floodplains, required restoration associated with housing developments, and use of native landscaping throughout campus. Implementation of these policies would effectively avoid and mitigate any potential impacts to wetland and biological resources in and around the campus from proposed development. These policies should be retained in the 2008 LRDP and discussed as mitigation measures in the EIR.

- Mitigation Measure BIO-1A requires the University to obtain all necessary permit authorizations from local, state, and federal agencies prior to the commencement of construction of any portion of the 2008 LRDP. CEQA Guidelines sec. 15124(d) state that permit approvals and compliance are considered to be part of the proposed project. If a project, as proposed with permit approvals, will significantly impact environmental resources, specific and feasible mitigation measures should be proposed to reduce the environmental impact to the extent feasible. Mitigation Measure BIO-1A, therefore, does not serve to adequately mitigate Impact BIO-1 to aquatic and biological resources to a less than significant level. The DEIR should incorporate specific mitigation measures to protect aquatic and biological resources consistent with the comments above.

- Mitigation Measures BIO-3A and BIO-3b conflict in their guidance concerning construction work conducted during the breeding season for sensitive birds. Please consider revising language and merging of the two mitigation measures.

Other Comments

- Analysis of transportation, air quality, water and housing demand and other issue areas in the EIR and 2008 LRDP should consider the existing impact of approximately 200 full time equivalent positions over those analyzed in the 1990 LRDP that are assumed to be existing conditions in the 2008 LRDP.

- The DEIR should include an analysis of the cumulative loss of open space with build-out of the 2008 LRDP considering other pending and approved projects in adjacent jurisdictions including the County of Santa Barbara, City of Goleta, and Santa Barbara Airport. This analysis is relevant to biological and recreational resources in the region.

- The Global Climate Change section of the DEIR should include more detailed information on the quantity of greenhouse gases resulting from buildout of the 2008

LRDP and the specific measures that will be taken to achieve the University's goal of "net zero" emissions.

- Correct Figure 4.6-1 in the DEIR to reflect the current configuration of Santa Barbara Airport Runway 7-25 and associated approach surfaces. In 2007 this runway was relocated 800' west on centerline.